

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

WENDY DAVIS, DAVID GINS, and TIMOTHY HOLLOWAY, Plaintiffs, v. ELIAZAR CISNEROS, RANDI CEH, STEVE CEH, JOEYLYNN MESAROS, ROBERT MESAROS, and DOLORES PARK, Defendants.	Civil Action No. 1:21-cv-00565-RP Hon. Robert Pitman
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**DECLARATION OF JOANNA SURIANI IN SUPPORT OF PLAINTIFFS’ MOTION
FOR ORDER TO SHOW CAUSE WHY DEFENDANT CISNEROS SHOULD NOT BE
HELD IN CONTEMPT OF COURT**

Pursuant to 28 U.S.C. § 1746, I, JoAnna Suriani, declare as follows:

1. I am an attorney and am admitted to practice in the District of Columbia. I represent Plaintiffs Wendy Davis, David Gins, and Timothy Holloway in the above-captioned action.
2. I am over 18 years of age, of sound mind, and otherwise competent to make this declaration. This declaration is based on my personal knowledge.
3. This declaration is submitted in support of Plaintiffs’ Motion for Order to Show Cause Why Defendant Cisneros Should Not Be Held in Contempt of Court.
4. On August 1, 2025, the Court granted Plaintiffs’ Motion to Compel Defendant Eliazar Cisneros to Pay Plaintiffs’ Experts’ Deposition Fees.
5. The Court ordered Defendant Cisneros to “make payment to Plaintiffs’ experts in the following amounts within fourteen days: \$2,720 to Dr. Peter Simi; \$3,485 to Dr. Kathleen Blee; and \$3,446 to Dr. Theron Bowman.”

6. Pursuant to this Court's order, Defendant Cisneros's payments were due on August 15, 2025.
7. On August 6, 2025, counsel for Plaintiffs provided instructions to Defendant Cisneros via his counsel, directing him to send the ordered payments to counsel for Plaintiffs at 2020 Pennsylvania Ave. NW, Suite # 163, Washington, DC 20006, and reminded him of the August 15, 2025 due date.
8. On August 19, 2025, counsel for Defendant Cisneros told me that Defendant Cisneros had not mailed any portion of the payments and would not make the ordered payments.
9. As of the filing of the motion to which this declaration is attached, counsel for Plaintiffs has not received any portion of the ordered payments from Defendant Cisneros.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on August 20, 2025, in Middlesex County, Connecticut.

/s/ JoAnna Suriani

JoAnna Suriani